

SWDP 3: Employment, Housing and Retail Provision Requirement and Delivery

- A. The partner authorities in south Worcestershire will plan, monitor and manage the delivery of housing, employment land and retail floorspace from 2006 – 2030, in accordance with Table 4e and the site allocations set out in SWDP 43 - SWDP 61, consistent with the development [and infrastructure](#) phasing plans in those policies and the Infrastructure Phasing Plan in SWDP 7⁸. This will both maintain the [five](#)-year supply of housing and employment land and ensure that priority locations for regeneration are developed earlier on in the life of the SWDP.
- B. Development proposals not in accordance with the development and infrastructure phasing plans will be resisted, unless the applicant demonstrates that the infrastructure necessary to support the development has substantial and current commitment by the agencies responsible for delivering that infrastructure.
- C. Employment provision for about 280ha will be made during the plan period, comprising the area subtotals, which are separate and non-transferable, set out in Table 4a.

Table 4a: EMPLOYMENT PROVISION 2006-2030	SUB-AREA SUBTOTALS ha
Wider Worcester Area (WWA) ⁹	120
Malvern Hills (excluding WWA)	40
Wychavon (excluding WWA)	120
South Worcestershire TOTAL*	280
<i>*of which Worcester City</i>	80

- D. Housing provision will be made for about ~~28,400~~[23,200](#) dwellings (net) during the plan period, comprising the area subtotals, which are separate and non-transferable and the related market housing and affordable housing provision set out in Table 4b.

Table 4b: HOUSING PROVISION 2006-2030	SUB-AREA SUBTOTALS	Market Housing	Affordable Housing ¹⁰
Wider Worcester Area (WWA)*	9,400	6,900	2,500
Malvern Hills (excluding WWA)	4,900	3,600	1,300
Wychavon (excluding WWA)	8,900	6,600	2,300
South Worcestershire TOTAL*	23,200	17,100	6,100
<i>*of which Worcester City</i>	5,500	4,600	900

⁸ See Annex I

⁹ See paragraph 29

¹⁰ To be delivered from development

<u>SUB AREA</u>	<u>AREA</u>	<u>AREA SUBTOTAL</u>	<u>Market Housing</u>	<u>Affordable Housing¹¹</u>
<u>Wider Worcester Area (WWA)</u>	<u>Wider Worcester Area (Worcester City*)</u>	<u>6,750</u>	<u>5,100</u>	<u>1,650</u>
	<u>Wider Worcester Area (Malvern Hills and Wychavon*#)</u>	<u>5,450</u>	<u>3,250</u>	<u>2,200</u>
<u>Malvern Hills (excluding WWA)</u>	<u>Malvern Hills (excluding WWA)</u>	<u>5,600</u>	<u>3,900</u>	<u>1,700</u>
<u>Wychavon (excluding WWA)</u>	<u>Wychavo n (excluding WWA)</u>	<u>10,600</u>	<u>7,300</u>	<u>3,300</u>
	<u>South Worcestershire</u>	<u>28,400</u>	<u>19,550</u>	<u>8,850</u>

Note: Figures may not sum due to rounding.

Note* Located within the district of

For monitoring purposes the target (market housing and affordable housing) for that part of WWA within Malvern Hills District is 4,550 and the target for that part of WWA within Wychavon District is 900.

Note: Figures may not sum due to rounding

E. The overall provision for both market and affordable housing to be sought from development will be located and phased in accordance with the subtotals set out in Table 4c.

<u>SUB-AREA SUBTOTALS</u>	<u>Phasing 2006 – 2013</u>	<u>Phasing 2013-2019</u>	<u>Phasing after 2019</u>
<u>Wider Worcester Area (WWA)*</u>	<u>9,400</u>	<u>3,100</u>	<u>2,700</u>
<u>Malvern Hills (excluding WWA)</u>	<u>4,900</u>	<u>2,000</u>	<u>1,100</u>
<u>Wychavon (excluding WWA)</u>	<u>8,900</u>	<u>3,500</u>	<u>2,000</u>
<u>South Worcestershire TOTAL*</u>	<u>23,200</u>	<u>8,600</u>	<u>5,800</u>
<u>*of which Worcester City</u>	<u>5,500</u>	<u>3,100</u>	<u>1,000</u>

Figures may not sum due to rounding

F.E. Retail provision will be made for about 50,000 square metres (net floorspace) during the plan period.

<u>Table 4d: RETAIL PROVISION</u>	<u>SUB-AREA SUBTOTALS</u>
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¹¹ To be delivered from development

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2006-2030	(net floorspace sq.m.)
Wider Worcester Area (WWA)*	30,000
Malvern Hills (excluding WWA)	7,500
Wychavon (excluding WWA)	12,500
TOTAL*	50,000
<i>*of which Worcester City</i>	<i>28,000</i>

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Table 4c Retail requirements 2013-2031 (net floorspace sq.m. rounded to nearest 100 sq.m.)

	Convenience	Comparison	Total
Wider Worcester Area (WWA)	0	30,726	30,726
Malvern Hills (excluding WWA)	669	6,786	7,455
Wychavon (excluding WWA)	0	1,326	1,326
TOTAL*	669	38,838	39,507

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G.F. The supply of employment, housing and retail to meet the provision requirements is set out in Table 4de

TABLE 4de: TOTAL OVERALL PROVISION 2006-2030	Employment ha	Homes ^M	Retail (sq.m.)	
			Food	Non-Food
SUPPLY COMPONENTS				
Wider Worcester Area				
Completions ^A	9	2,184 2,587	2,600 5,111	10,085
Commitments ^B	35.4	940 2,015	10,000 1,273	6,000 8,197
Empty Homes in Use	N/A	150	N/A	N/A
Extra care housing release	N/A	100	N/A	N/A
Windfall Allowance ^C	N/A	847861 717	N/A	N/A
Urban Capacity Allocations ^D	32	1,455 1,886	0	10,000 22,000
Urban Extensions ^{E, F}	41	3,925	2,000 1,500	500
Urban Extensions (Worcester City) ^{E, F}		80		
Urban Extensions (Malvern Hills District) ^{E, F}		4,585		
Urban Extensions (Wychavon)		385		

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District) ^{E, F}				
SUPPLY Subtotal	117.4	9,615 <u>12,255</u>	30,600 <u>7,884</u>	<u>40,782</u>
Malvern Hills (excluding WWA)				
Completions ^A	10.84	<u>1,326</u> <u>1,686</u>	<u>1,248</u> <u>0</u>	<u>536</u> <u>0</u>
Commitments ^B	10.76	<u>709</u> <u>944</u>	<u>400</u> <u>880</u>	<u>0</u> <u>88</u>
Empty Homes in Use	N/A	150	N/A	N/A
Extra care housing release	N/A	200	N/A	N/A
Windfall Allowance ^C	N/A	<u>562</u> <u>419</u>	N/A	N/A
Urban Capacity Allocations	9	<u>397</u> <u>406</u>	1,011	3,724
Urban Extensions	10	<u>700</u> <u>800</u>	0	0
Village Allocations ^G <u>Allocations</u> ^H	0	<u>554</u> <u>827</u>	0	0
Tenbury Wells Allocations	0	<u>70</u> <u>75</u>	<u>18</u> <u>0</u>	<u>302</u> <u>0</u>
Upton-upon-Severn Allocations	0	<u>100</u> <u>68</u>	<u>17</u> <u>0</u>	<u>214</u> <u>0</u>
SUPPLY Subtotal	40.6	<u>4,768</u> <u>5,626</u>	<u>7,470</u> <u>1,891</u>	<u>3,812</u>
Wychavon (excluding WWA)				
Completions ^A	32.38	<u>1,399</u> <u>2,749</u>	<u>7,142</u> <u>2,616</u>	<u>4,212</u>
Commitments ^{B, G, H, I, J}	52.88	<u>2,136</u> <u>4,867</u>	<u>4,200</u> <u>2,468</u>	<u>3,338</u>
Empty Homes in Use	N/A	250	N/A	N/A
Extra care housing release	N/A	200	N/A	N/A
Windfall Allowance ^C	N/A	<u>963</u> <u>958</u>	N/A	N/A
Urban Capacity Allocations	0	<u>784</u> <u>711</u>	500	750
Urban Extensions	33.5	<u>2,140</u> <u>835</u>	0	0
Village Allocations ^{GFF}	0	<u>1,173</u> <u>648</u>	0	0
Major Rural Employment Allocations (Throckmorton Airfield¹² and Interbrook, Pinvin¹³)	14.45	N/A	N/A	N/A
Major Development Area	6	N/A	N/A	N/A

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¹² map reference SWDP3/1.

¹³ Proposals map reference SWDP3/2.

intensification (land equivalent)				
SUPPLY Subtotal	139.21	9,042	10,768	12,592
				5,584
South Worcestershire	297.21	23,425	50,662	52,894
TOTAL SUPPLY		28,649	15,359	

Notes:

- A. Total number of dwellings (net) completed 1 April 2006 - 31 March ~~2012~~ 2014.
Total amount of employment space completed 1 April 2006 - 31 March 2011.
Total amount of retail floorspace (net) completed 1 April 2006 - 31 March ~~2011~~ 2010.
- B. Total number / amount of homes / employment space with planning permission. Includes 166 park homes at Leedons caravan park, Broadway. A discount of ~~4.5%~~ for planning permissions not being implemented has been applied to all outstanding commitments (excluding dwellings under construction).
~~Retail commitments are as of 31/03/10 plus those between 01/04/10 – 31/03/13.~~
- C. Windfall is unallocated housing development. The annual windfall rate allowances for 2016 - 2026 and for 2026 - 2030 respectively are:
- Worcester ~~69 and 46~~ 63 and 42.
 - Malvern Hills ~~45 and 30~~ 35 and 23.
 - Wychavon 82 and 55.
- To avoid double counting with the completion of small windfall commitments existing at ~~2012~~ 2014, the allowance for small, non-garden windfall completions is for the period ~~2016 – 2017/18~~ to 2029 ~~– 2030~~. In addition, this allowance is reduced further by discounting the supply of small site allocations (5 to 9 dwellings) that could otherwise be windfalls forecast for completion ~~2016 – 17~~ 2017/18 to 2030.
- D. These allocations are all within the Worcester City administrative area and are set out in policies SWDP 43 - 44.
- E. These allocations are beyond the Worcester City administrative area, except for approximately 80 dwellings on site SWDP 45/1. The Urban Extensions are set out in SWDP 45.
- F. The retail floorspace for Worcester urban extensions excludes small shops proposed in SWDP45/2 and SWDP45/4
- G. Village allocations are set out in policies SWDP 59 - 61.
- H. Includes 39 dwellings on land at Stonebow Road, Drakes Broughton, allowed on appeal after April 2014.
- G.I. The supply in Wychavon includes the large site at Long Marston for 380 dwellings allowed on appeal after April 2014.
- H. ~~In order to meet the 5 five-year housing land supply, Wychavon District Council has granted planning permission or had appeals allowed for 6 six major housing proposals which are departures from the adopted Wychavon District Local Plan. These Five housing schemes included in the commitments are:~~
- ~~Allesborough Hill, Pershore (45).~~
 - ~~Nnorth of Broadway Road, Evesham (34).~~
 - ~~bBetween Dudley Road and Station Road Honeybourne (71).~~
 - ~~Off Station Road, Honeybourne (44).~~
 - ~~Rrear of Sunnyfield House, Wychbold (39).~~
 - ~~Crown Lane, Wychbold (60).~~
 - ~~The sixth, at Crown Lane, Wychbold (60) is an allocation.~~
 - ~~Thornleigh Nurseries, Drakes Broughton (11) was also included (this was an exception site).~~
- J. Includes 765 dwellings allowed on appeal after March 2014 at Yew Tree Hill, Droitwich.
- K. Policies Map reference SWDP3/1.
- L. Policies Map reference SWDP3/2.

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^M The completions and commitments supply totals include dwellings on SWDP site allocations that were completed by end March 2014 or committed. To avoid double counting, the totals in the allocations supply categories exclude those completions and commitments on SWDP allocations.

H.G. Worcester urban extensions are to be delivered on land abutting the administrative boundary of Worcester city and not elsewhere within Malvern Hills or Wychavon.

I. The availability of housing land will be kept under review, maintaining a continuous supply of suitable sites to deliver the overall south Worcestershire housing target and to maintain a rolling 5 year supply of deliverable housing land consistent with the area sub-totals set out in SWDP 3D Table 4b. New housing sites identified in the SWDP will be released for development consistent with Table 4c, having regard to:

i. The need to maintain a five-year supply of housing land.

ii. SWDP 13 on making effective use of land.

iii. The contribution that will be made towards improved infrastructure provision, including affordable housing.

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Reasoned Justification

1. The main focus of the SWDP is to provide development that supports the area's economic prosperity. The key mechanisms to achieve this include making provision for:
 - a. The right amount and type of land for employment uses in locations where business will thrive and be more resilient to the twin challenges of global competition and moving towards a low-carbon economy.
 - b. Sufficient housing provision that enables more of the labour force to be housed locally and provide the right mix to meet the wide range of housing needs.
 - c. Retail development that is more resilient to changing retail behaviour and challenges to the traditional High Street, and that supports the vitality and viability of both town centres and town centre uses in south Worcestershire.
 - d. Infrastructure that supports communities housing the labour force and facilitates the movement of labour, goods and materials through alignment of the phasing of development and supporting infrastructure; this will include provision of facilities supporting training and skills.

Housing

Housing Provision ~~T~~Targets

~~2. The SWDP's locally derived total housing provision target in SWDP 3 (Table 4B) is based on the Worcestershire Strategic Housing Market Assessment (SHMA) 2012. The SHMA is the latest assessment of the full housing needs of the SWDP area. It provides robust, credible evidence on which to base the planned scale of growth in south Worcestershire. The SHMA developed scenarios of housing growth identifying the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period that meet household and population projections. These were informed by national demographic and household projections, evidence on job growth and information about the local housing market. There is a difference between households and housing, which SHMA and the plan fully recognise. The housing provision calculations have taken vacancies, second homes and non-delivery into account.~~

2. The SWDP's locally derived total housing provision targets in SWDP 3 Table 4b are based on the evidence in the 'SWDP Objective Assessment of Housing Need' January 2014 and subsequent recommendations of the Inspector for the SWDP Examination on the objective assessment of housing need (OAHN). The latter identified the scale of the need for housing over the plan period. That replaced the 2012 SHMA as the latest

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assessment of the full housing needs of the SWDP area. It provided robust, credible evidence on which to base the planned scale of growth in south Worcestershire. The Addendum to the Housing Background Paper (2014) sets out the evidence providing the detailed justification of the planned scale and distribution of housing development, alignment of housing, jobs and the labour force.

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3. SWDP 3 plans for growth of about 28,400 dwellings in South Worcestershire for the plan period 2006 to 2030. This policy target is in line with the conclusions and recommendations of the Inspector for the SWDP Examination. The rounded South Worcestershire housing provision target of about 28,400 reflects the OAHN's overall scale of housing need of 28,370 dwellings.

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4. The OAHN is based on the evidence, being the mid point between the average of housing growth forecasts from two suites of jobs-led sensitivity scenarios (SENS2 and SENS3). These use a trend-based demographic growth scenario modified to take account of additional in-migration resulting from forecast employment growth. The scenarios of housing growth identified the scale of housing that the population is likely to need over the plan period. The housing growth forecasts underpinning those scenarios were informed by up to date national household and population projections. Taking full account of a range of up to date and representative job forecasts, the jobs led scenarios forecast population, household and housing growth consistent with delivering sufficient labour force to meet jobs growth, allowing for unemployment and commuting. The housing growth forecasts also took vacancies and second homes into account. The OAHN had regard to information about the local housing market, and other market signals.

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3. SWDP 3 plans for growth of about 23,200 dwellings for 2006 – 2030, which reflects the overall scale of housing growth associated with SHMA Sensitivity Scenario 2 (23,157 dwellings). This policy target is in line with the SHMA evidence, which states that this scenario represents an upper limit for the partner authorities to consider when setting a housing target.

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4. Identifying sources of housing supply to meet this scenario has enabled the partner authorities to plan to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF Framework. The sources of supply identified in Table 4e exceed the total provision requirement target. On this basis there is no unmet need to address.

5. The Housing Background Paper (2012) sets out the detailed justification of the planned scale and distribution of housing development, including an improvement to the alignment of housing, jobs and the labour force.

Sub-area Housing Provision Targets

5. SWDP 3 sets out spatial Sub Area and Area policies for housing targets and supply. Table 4b provides housing provision targets based on Sub Areas and Areas. The 'geography' of those areas is defined in SWDP 2. The matching policy towards Sub Area housing supply is set out in SWDP3 Table 4e.

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6. Whilst the South Worcestershire OAHN housing need matches the SWDP3 Table 4b total housing requirement target, the Sub Area and Area targets in Table 4b differ from the individual district need figures provided by the OAHN¹⁴. The SWDP is a joint plan that has been positively prepared. Through joint working and co-operation the Plan has redirected unmet need within the parts of the plan area and so addressed 'larger than local' cross-boundary issues relating to the following:

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a) Worcester City's built up area is tightly constrained inside its boundaries. There is insufficient space in the City's administrative area to meet all the district need for development, especially housing. The target of 6,750 dwellings is based on the forecast supply of housing including future deliverable and

¹⁴ The Housing Background Paper Addendum 2014 provides justification and analysis of the Sub Areas' provision and supply.

developable sites to 2030. At 6,750 the Wider Worcester Area (Worcester City) Area target is below the 9,830 dwellings Worcester City need identified in the OAHN.

b) Because of natural and environmental constraints, Malvern Hills (Excluding WWA) Sub Area) has limited ability to accept new development. The target of 5,600 is based on the forecast supply of housing including future deliverable and developable sites to 2030 that have been identified within the Sub Area. At 5,600 dwellings, the policy provision target for the Sub Area is below the 8,590 dwellings Malvern Hills District stated in the OAHN.

7. The SWDP relies on the SWDP 2 policy designation of the Wider Worcester Area (WWA) as the means to resolve both cross-boundary issues. The policy accords with the approach set out Framework paragraph 179 to deal with situations where development requirements cannot wholly be met within an LPA's own area.

8. The Wider Worcester Area enables Worcester as a sub regional centre to grow beyond the City boundary. The scale of supply identified within the City (about 6,780 dwellings) comes from completions, commitments, future small windfalls and allocations. Identification of the latter took account of site availability, the viability of delivering affordable housing and infrastructure, and material considerations such as the Green Belt, flood risk, heritage assets, the Local Green Network, and the need for employment land. The share of Worcester's need for housing that is unmet in the City (about 3,100 dwellings) and part of the need for employment land (about 25ha) is redirected to the Worcester urban extensions so that need is met in the WWA on sites just outside the administrative boundary, in both Malvern Hills and Wychavon (policy SWDP 3H).

9. The Malvern Hills (Excluding WWA) Sub Area target has been based on supply consistent with a scale of growth in the Sub Area which reflects the need to respect key natural and environmental assets. This also avoided generating a level of rural dispersal that would be at odds with the SWDP strategy. Other material considerations were taken into account, such as site availability and the viability of delivering affordable housing and infrastructure. Redirection of approximately 3,000 dwellings Malvern Hills need was necessary because of limited opportunities for urban growth in Malvern Hills District. This is due to constraints on the development of Malvern resulting from proximity to the Malvern Hills AONB and the need to protect the AONB from adverse environmental impacts of extensive, concentrated urban development nearby. In setting and justifying the housing provision targets, the displaced housing need from the Sub Area has been redirected in the first instance to that part of Wider Worcester Area situated within Malvern Hills District. Approximately 600 dwellings unmet need has been redirected to Wychavon (Excluding WWA) Sub Area, to locations with the strongest existing economic linkages. This approach enables the Malvern Hills housing need to be met within the plan area. One consequence of this approach is that by accommodating 35% of the OAHN need outside the Sub Area it provides the potential to damp down the historic trend of large-scale net in-migration into the Malvern Hills settlements in the Sub Area which has put pressure on that local housing market.

10. The SWDP addresses the consequences of accommodating the redirected unmet Worcester need and the displaced Malvern Hills need at the Worcester urban extensions, including:

- a) The need to provide employment opportunities at major urban extensions which accommodate most of the redirected and displaced unmet housing need, in order to reduce the need to travel.
- b) Priority for investment in a package of transport infrastructure and services to enable the labour supply to access employment in the City and in Malvern Hills.
- c) A meaningful proportion of the affordable housing in the Worcester South and West urban extensions will meet affordable housing need from Malvern Hills.
- d) The need to co-ordinate services provided by the county and district councils and other providers to support communities in the wider Worcester area.

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6. The sub-area targets in Table 4b differ from the district figures in SHMA Sensitivity Scenario 2¹⁵. At 4,900 dwellings, the policy provision for Malvern Hills (outside the Wider Worcester Area) is below the housing level based 7,500 dwellings in that scenario. The scale of growth of the Plan's sub-areas has been moderated by the need to respect key natural and environmental assets and the sub-regional role of Worcester. Redirection of approximately 2,600 of the Malvern Hills housing requirement has been necessary because of limited opportunities for urban growth in Malvern Hills District. This is due to constraints on the development of Greater Malvern and in Malvern Vale resulting from their proximity to the Malvern Hills AONB and the need to protect the AONB from adverse environmental impacts of extensive, concentrated urban development nearby. Other material considerations were taken into account, such as the viability of delivering affordable housing and infrastructure. The SWDP has been positively prepared through joint working and this co-operation has addressed "larger than local" cross-boundary issues relating to housing. This enabled the unmet housing requirement of Malvern Hills to 2030 to be met within the plan area by redirecting and absorbing its displaced housing requirement within the Wider Worcester Area and in Wychavon. The displaced 2,600 dwellings are divided approximately almost evenly between these two sub-areas. One benefit of this approach is that it provides an opportunity to damp down the historic trend of large-scale net in-migration into the Malvern Hills area (which has put pressure on that local housing market) by making alternative provision at more sustainable locations elsewhere in the SWDP area that can accommodate the displaced requirement.

7. The SWDP addresses the consequences of accommodating the displaced Malvern Hills requirement, including:
- a. The need to provide employment opportunities at major urban extensions accommodating part of the displaced demand, in order to reduce the need to travel.
 - b. It acknowledges the need for transport infrastructure and services to enable the labour supply to access employment in Malvern Hills.
 - c. A meaningful proportion of the affordable housing in the Worcester South and West Urban Extensions will meet affordable housing need from Malvern Hills.
 - d. The need to co-ordinate services provided by the county and district councils and other providers to support communities in the wider Worcester area.

Unmet Need from Other Areas outside South Worcestershire

11. The housing provision targets in Table 4b relate to South Worcestershire needs. Those needs include substantial net in-migration forecast to 2030, including in-migration to achieve the necessary uplift in labour force in the plan area.

12. The targets do not make further provision for external need over and above the forecast migration taken into account in the population forecasts underpinning the OAHN. The partner authorities had no evidence of additional unmet housing need from outside this plan area that must be met in the SWDP area. Moreover, it has not been clearly established through any other LPA's Local Plan process that external unmet needs from outside South Worcestershire must be met through provision in the SWDP area.

8. Neighbouring local planning authorities have provided no evidence of unmet housing need in their areas that needs to be met in south Worcestershire. No evidence has yet been provided that indicates forthcoming plan-making in those areas cannot accommodate their own needs or would result in unmet need that has to be provided for in the SWDP area.

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¹⁵—The Housing Background Paper provides justification and analysis of the Sub-Areas' provision and supply.

9. From an objective assessment of development requirements, the partner authorities conclude that the SWDP meets an appropriate level of unmet housing requirement to 2030 arising from more distant areas outside south Worcestershire (such as the West Midlands), which it is reasonable to accommodate within this plan area. South Worcestershire will continue to provide housing to accommodate substantial in-migration, but at levels consistent with sustainable development and an economic prosperity led plan.

Duty to Co-operate

13. The partner authorities undertook diligent joint working, to identify their requirements through evidence gathering and during plan preparation. The SHMA 2012 and the subsequent OAHN 2014 involved joint working with neighbouring authorities within Worcestershire to prepare evidence on housing need. Drawing on the latest evidence, the forecast housing need increased and the related housing provision target rose to 28,400. The SWDP Sub Area and Area targets sum to that total. The partner authorities also co-operated both with adjoining authorities and with more distant local authorities, such as councils in the West Midlands, to consider strategic priorities for the delivery of homes, including cross-boundary housing requirements. The evidence base documented the joint working and other activities demonstrating effective co-operation consistent with the Duty to Co-operate legal requirement and the Framework.

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10. The partner authorities undertook diligent joint working, to identify their requirements through evidence gathering and during plan preparation. The SHMA involved joint working within Worcestershire to prepare evidence on housing need. The partner authorities worked with neighbouring authorities because housing market areas cross administrative boundaries. They co-operated both with adjoining authorities and with more distant local authorities, such as councils in the West Midlands, to consider strategic priorities for the delivery of homes, including cross-boundary housing requirements. As a result, the housing provision rose to 23,200. The evidence base sets out the joint working and other activities demonstrating effective co-operation consistent with the Duty to Co-operate requirement.

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Affordable hHousing Rrequirement

11.14. Evidence in the Housing Background Paper indicates that the estimated total need for affordable housing in the plan period is at least 8,250 8140 dwellings. This takes into account SHMA evidence on need already met in the plan period and the future need to be met being based on:

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- a. 976 871 completions to 2011.
- b. Total commitments for 329 as at April 2011 (updated monitoring).
- c. A further 3,785 affordable dwellings to meet the current backlog of need and net newly arising need 2011 - 2016, plus;
- d. Additional net newly-arising need for 2016 - 2030 in the order of at least 3,155 dwellings.

Supply

12.15. The Addendum to the Housing Background Paper, 2014 provides the audit trail of the an objective assessment of the future sources of supply of affordable housing achievable from development. It indicates that if affordable housing delivery relied only on the uplift of development land value, then total potential supply of additional affordable housing development in the plan period would amount to about 6,400 8,850 affordable dwellings. This assessment is based on:

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- a. 976 871 completions 2006 – 2011, plus 286 971 completions 2011 – 2012 2014, plus total commitments (permitted but either under construction or not yet started) for 704 1,752 dwellings as at April 2012 2014 plus sites allowed on appeal April to August 2014-
- b. The potential to deliver up to approximately 4,440 5,288 affordable dwellings from future housing supply, from which affordable housing can be sought.

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13.16. This takes into account:

- a. The residue of overall housing provision not committed (approximately 13,800 dwellings, including delivery on sites allocated in the SWDP not yet permitted), as at April 2012 (approximately 13,680 dwellings, including delivery on sites allocated in the SWDP but excluding empty homes brought back into use and housing release as households move to extra-care housing with high-care packages).
- b. SWDP 15's sliding scale of affordable housing to be sought from sites permitted for dwellings in Use Class C3.
- c. The supply from commitments including sites allowed on appeal April-August 2014 already takes account of contemporaneous viability issues and evidence of local need. The consequence of the Government's changes to regulations allowing developers to renegotiate agreed affordable housing contributions, existing or future, has not been included in the supply forecast as it would prejudice the negotiations in advance of developers' site and time specific evidence. The joint allocations policy approach within Worcestershire under Home Choice Plus means that the likelihood of there being no affordable housing need for affordable housing delivered within South Worcestershire is greatly reduced.
 - b.
- e. A further reduction of 5%, made for forecasting purposes only, to discount lower delivery rates prior to plan adoption and allow for circumstances where there may be no local need, consistent with the criteria for SWDP 15 or where there are viability issues.
- d. Use Class C2 housing (residential care homes, plus the high-care end of extra-care housing) and 'sui generis' non-self-contained student accommodation are not subject to SWDP 15 and so will not contribute to the supply of affordable dwellings.
- e. The uplift in land values achieved through Use Class C3 (market housing provision) is a key opportunity in this plan period to meet much of the residue of unmet affordable housing need, but viability issues constrain the ability of development to meet all of that need, as indicated in the Affordable Housing Economic Viability Study.

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17. The plan area target of 8,850 affordable dwellings could accommodate the forecast total level of potential need, and is a realistic target for delivering affordable housing via the uplift in development value. The potential shortfall forecast in the Wider Worcester Area is expected to be reduced through other, non-development sources of supply as well as the joint allocations policy approach.

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a. Changes in tenure within the existing stock, or from sources external to south Worcestershire, which will not require the construction of additional dwellings, including:

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i. Change in stock in Worcester from market housing to private sector rent that is affordable (the potential for delivering 285 units through the Local Lettings Agency during the plan period is additional to the combined forecast supply of about 3,870 affordable housing units, on which the combined 3,850 targets in SWDP 3 for the WWA are based).

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14. ~~The target of 6,100 affordable dwellings is a minimum. The target is about 2,150 below the total level of potential need, but it is a realistic target for delivering affordable housing via the uplift in development value. It is expected to be added to through other, non-development sources of supply:~~

a. ~~Changes in tenure within the existing stock, or from sources external to south Worcestershire, which will not require the construction of additional dwellings, including:~~

i. ~~Change in stock in Worcester from market housing to private sector rent that is affordable (the potential for delivering 570 units through the Local Lettings Agency during the plan period is additional to the 6,100 target in SWDP 3).~~

- ii. [Registered Social Landlords](#) (RSLs) purchasing existing satisfactory properties and acquiring properties via Mortgage Rescue.
- b. Affordable housing is expected to be delivered through means that are allowed for by policy but are not yet fully quantified, so are not counted towards the policy housing provision total at this time (i.e. they would be in addition to the ~~23,200~~ 28,400) from:
 - i. Rural exceptions.
 - ii. Neighbourhood Plans and Community Right to Build.
 - iii. Delivery of affordable housing funded by financial contributions from small sites (less than 5 dwellings).
- c. Other 100% affordable schemes. If built, these would raise the total supply of affordable housing counted towards SWDP 3. The products listed below are new; lack of national or local evidence about actual delivery precludes identifying a specific allowance in Table 4b provision at this time:
 - i. RSLs building more “affordable rent” housing without grant funding by raising money on the financial market and using funding generated by affordable rents.
 - ii. Local Authority New Build.
 - iii. 100% grant funding / affordable housing delivered through a range of mechanisms currently employed; e.g. the Affordable Homes Programme (replacing the National Affordable Housing Programme), Kickstart (HomeBuy Direct and NAHP).

~~15-18.~~ The market housing provision total and subtotals in SWDP 3 are calculated by subtracting only the potential for delivering ~~6,100-8,850~~ affordable dwellings through development value uplift from the ~~23,200~~ 28,400 total, without further deduction for 100% affordable housing schemes.

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~~16-19.~~ Monitoring will indicate whether higher levels of affordable housing are delivered. The SWDP Review is the appropriate mechanism to consider whether to amend the housing provision totals and / or the subtotals for market housing and / or affordable housing in the light of evidence about 100% affordable housing schemes delivery.

Delivering Development

~~17-20.~~ The Housing Implementation Strategy is set out in paragraphs 17 – 43 and is developed from Stronger Community Objectives 1, 2, 3 and policies on housing supply, particularly:

- SWDP 3 (housing requirement and delivery).
- SWDP 43 - 61 (site allocations).
- SWDP 14 (housing mix).
- SWDP 15 (affordable housing needs).

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~~18-21.~~ Other housing policies in the SWDP are:

- SWDP 16 (rural exceptions).
- SWDP 18 (replacement dwellings).
- SWDP 19 (rural worker dwellings).
- SWDP 42 (residential moorings).

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~~19-22.~~ Gypsy, traveller and travelling show-people’s accommodation needs are additional to the needs identified in SWDP 3. Their needs are addressed through other policies, notably through SWDP 17 – Travellers and Travelling Showpeople Accommodation.

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Sources and Components of Supply

~~20-23.~~ The policies in the SWDP enable the implementation strategy to be underpinned by a balance in the components of housing supply. ~~21% of the provision requirement has been completed and there are commitments for a further 16%. 10% is met from small non-garden windfalls, with 4% individually derived both to be met in total from bringing empty homes back into use and from the release of Class C3 housing. The largest component is from site allocations, which contribute 48% to supply. This mix of sources provides a healthy balance between certainty and flexibility. Delivery of housing is not over-reliant on any one category.~~ ~~25% of the provision requirement has been completed and there are commitments for a further 27% (permitted), 7% is met from forecast small non-garden windfalls. The largest component is from site allocations (not built or committed), which contribute 41% to housing provision (24% is in WWA, 9% and 8% respectively in the Malvern Hills (Ex-WWA) and Wychavon (Ex-WWA) Sub Areas). This mix of sources provides a healthy balance between certainty and flexibility. Delivery of housing is not over-reliant on any one category.~~

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~~21-24.~~ The Strategic Housing Land Availability Assessment (SHLAA) is updated annually and has informed the assessment and allocation of sites. The Housing Background Paper and the Background Paper on Site Allocations provide more detail on the use of this evidence to develop policy.

~~22-25.~~ As well as dwellings completed since 1 April 2006, those dwellings under construction or with planning permission but not yet started (the latter discounted by ~~4.5%~~) are part of the supply counted towards housing provision. In addition, new homes will be realised through:

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- a. The development of allocation sites identified within SWDP policies SWDP 43 - 61 (site allocations).
- b. The development of small windfall sites and the change of use of buildings where land and premises are shown to be surplus to the requirements of other land uses.
- c. The provision of new homes through conversions.

~~26.~~ Evidence supports the forecast supply of small, non-garden windfalls post-~~2012~~ March 2014, consistent with NPPF the Framework. Future large windfalls are not forecast. However, if delivered they will be reported through the monitoring of development.

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~~23-27.~~ The Framework makes clear that local planning authorities should identify and bring back into residential use empty housing and buildings, in line with local housing and empty homes strategies. No specific allowance for net additional housing supply from bringing empty homes back into use is made for this in SWDP 3. Any future empty homes strategy and evidence relating to the means to support delivery may enable a future SWDP review to take this potential supply source into account in line with national guidance.

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~~24.~~ Housing supply is also added to by:

- a. ~~Bringing long-term empty homes back into use.~~
- b. ~~The release of housing achieved through delivery of extra-care housing that involves a significant level of care through a care package.~~

~~25.~~ The NPPF Framework makes clear that local planning authorities should identify and bring back into residential use empty housing and buildings, in line with local housing and empty homes strategies. A realistic allowance for bringing long-term empty homes back into use in the sub-areas has been included in SWDP 3 as part of the supply identified to meet the provision requirement.

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~~26-28.~~ The plan includes an allowance for the potential release of housing that is achieved as extra-care/high-care package housing is developed and occupied. Unlike dwellings that are inherited, which do not result in a net increase in the release of Use-Class C3 dwellings, the development of this extra-care housing has the effect of creating additional local capacity, but this is only counted the

~~first time that occupants move from their houses into extra-care accommodation. Only high-care package extra-care housing is taken into account in calculating this type of housing release.~~

~~27-29.~~ Affordable housing delivered through Neighbourhood Plans and Community Right to Build, and / or funded by financial contributions from small sites, is an unquantifiable source of supply that is additional to the forecast of supply identified in Table 4e. This also applies to rural exception sites. However, if delivered they will be reported through the monitoring of development.

~~28-30.~~ Over time other sites may be identified in later Strategic Housing Land Availability Assessment updates. Development of these sites would add to housing supply. However, at this time they are unknown and so are not included in the supply figures set out in Table 4e.

Spatial Distribution of Supply

~~31.~~ **Wider Worcester Area** - In order to implement SWDP 3, an urban concentration strategy for the long-term growth of Worcester has been developed. This will be achieved through the development of urban extensions immediately adjoining the city boundary in Malvern Hills and Wychavon, as Worcester cannot meet its long-term employment and housing needs within its administrative boundary. ~~Additional work on urban capacity for the city, including an allowance for small windfalls, has demonstrated that the number of dwellings delivered through development that can be accommodated within the city boundary can be increased to about 5,400 homes, plus an allowance for about 150 empty homes brought back into use and about 100 dwellings released as households move into extra-care homes with higher-care packages. At 3,925 the scale of urban extension allocations for the Wider Worcester Area is sufficient to address the revised requirement for 9,400 dwellings from 2006 – 2030. Additional work on urban capacity for the city, including an identification of housing allocations, commitments and completions plus an allowance for small windfalls, has demonstrated that the number of dwellings delivered through development that can be accommodated within the city boundary can achieve about 6,700 homes in the plan period. At about 5,550 the scale of urban extension allocations for the Wider Worcester Area combined with supply is the City, is sufficient to address the combined targets (6,750 and 5,450 dwellings) for the two Areas comprising the Wider Worcester Area. The urban extensions provide enhanced capacity to deliver urban concentration and meet the additional housing needs of Malvern Hills and Worcester City. The scale of housing in the Wider Worcester Area policy Sub Area supports delivery of strategic objectives in the SWDP. Notably, by delivering sufficient new homes to support economic growth, regeneration, allocating development in locations with good access to local services, maximising transport choice and maximising opportunities to deliver affordable housing.~~

~~29-32.~~ If future monitoring indicates a significant change in circumstances then this would require a review of how the objective of meeting Worcester's needs and unmet needs from Malvern Hills in the Wider Worcester Area would be implemented in detail. This would relate to circumstances impacting on Worcester or Malvern Hills needs or in delivering housing supply to meet needs.

~~30-33.~~ **Wychavon and Malvern Hills Districts** - To meet the development needs of Wychavon and Malvern Hills districts, the majority of development is to be focused at the towns of Droitwich Spa, Evesham, Malvern and Pershore. The SHLAA process has identified a number of potential urban capacity sites within these towns. However, brownfield urban capacity is relatively limited; to meet the proposed levels of development, a number of urban extensions are necessary in Droitwich Spa, Evesham, Pershore and Malvern. The remaining development will be accommodated through smaller site allocations within the development boundaries of the towns as set out in the urban site allocation policies. Smaller allocations in Category 1, 2 and 3 villages provide for local needs in the rural areas, together with completions, commitments and overall windfall forecasts. Allowances for about 250 and 150 empty homes brought back into use in Wychavon and Malvern Hills respectively, together with about 200 dwellings in each area released as households move into extra-care homes with higher-care packages, complete the supply picture for SWDP 3.

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Maintaining a 5Five-Year Housing Land Supply

- 34-34. The expected rate of housing delivery over the plan period is illustrated through a "housing trajectory" (Annex E). There is a trajectory for each sub-area, which illustrates the housing development that has been built in the plan area since 2006 and the levels of development currently anticipated over the rest of the plan period.
35. The forecast of housing supply is analysed in the housing trajectories in Annex E. This analysis uses a plan - monitor - manage approach to consider whether the plan's policies can maintain a rolling 5five-year supply. The SWDP analysis is based on annualised completion rates; "monitor" compares completions against the annualised rates and "manage" considers what has been delivered against the residue of what is left to be delivered. The trajectories demonstrate the 'front-loading' of development in the SWDP, notwithstanding current turbulent economic conditions, without being over-optimistic about delivery rates.
36. Five-year housing land supply calculations will be produced annually for each of the three Sub Areas set out in SWDP 3 D Table 4b. SWDP 3 Table 4b also has a specific policy target for WWA (Worcester City). Worcester City Council will make a separate calculation for its administrative area. SWDP3 Table 4b also has a footnote relating to the WWA (Wychavon and Malvern Hills) Area which breaks down the Area target, providing separate indicative 'targets' for Malvern Hills and Wychavon, for the purposes of monitoring the five year housing land supply. Malvern Hills and Wychavon District Councils will make separate calculations for those parts of their administrative areas within and outside the Wider Worcester Area (WWA) in accordance with SWDP 3D Table 4b. This enables the LPAs to comply with Framework paragraph 49. "Separate and non-transferable housing provision" in the policy means that any shortfall identified in the five-year housing land supply against any Area sub total will not be met elsewhere in another Sub Area or Area identified in SWDP 3..
37. Detailed evidence is set out in the Housing Background Paper Addendum 2014. That evidence demonstrates how the plan can maintain a 'rolling' five-year supply with either a 5% or 20% buffer brought forward from the end of the plan period, taking into account the site allocations and other supply components in SWDP 3 Table 4e. The Housing Background Paper Addendum demonstrates that for the purposes of plan preparation there was no evidence of persistent under-delivery in Worcester city and so using the residual ('Liverpool') method to calculate the five-year housing land supply was appropriate for Worcester City. The residual method was also appropriate for the Wider Worcester Area due to the site specific phasing of Worcester urban extensions. Even after applying the 'Sedgefield' approach to the Malvern Hills (Ex WWA) and to the Wychavon (Ex WWA) Sub Area, the evidence demonstrated how a 'rolling' five-year supply with a 20% buffer can be maintained.
38. The forward looking 5 year supply position declines at the end of the plan period but this is because the Framework does not require the SWDP to provide a land bank at the end of 2030. The plan review is the correct mechanism for identifying supply after 2030.
- 32-39. The housing trajectories will be monitored and updated on an annual basis through the Annual Monitoring Report and also through roll-forward and further reviews of the Strategic Housing Land Availability Assessment (SHLAA). This will also provide the evidence to justify whether each LPA should use the residual or 'Sedgefield' approach in the future. Annual monitoring will include monitoring applicants' evidence which they use to demonstrate the extent to which their proposed housing development will contribute to the five year deliverable housing land supply. Over time this can be compared to delivery achieved on those developments.
33. 5Five-year housing land supply calculations will be produced annually for each sub-area plus Worcester city. "Separate and non-transferable housing provision" in the policy means that any

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~~shortfall identified against the five-year housing land supply in one sub-area will not be met elsewhere in the SWDP area.~~

~~34. Detailed evidence is set out in the Housing Background Paper. That evidence demonstrates how the plan can maintain a "rolling" five-year supply with either a 5% or 20% buffer brought forward from the end of the plan period, taking into account the site allocations in the plan and the other supply components in SWDP 3, Table 4e. The residual method used to calculate the five-year housing land supplies is robust. The Housing Background Paper demonstrates why this method is used in preference to other models. The NPPF Framework does not require the SWDP to provide a land bank at the end of 2030. The housing trajectories will be monitored and updated on an annual basis through the Annual Monitoring Report and also through roll forward and further reviews of the Strategic Housing Land Availability Assessment (SHLAA). Annual monitoring will monitor applicants' demonstration of the extent to which proposed housing development will contribute to the five-year housing land supply.~~

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~~35.40. By contrast, at April 2012 when the methodology for static five-year supply analysis based on SHLAA guidance precluded counting the allocations in this local plan before it is adopted, the five-year housing supply positions with 5% buffers were :~~

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- Wider Worcester Area (WWA) 2.34 years.
- Malvern Hills (excluding WWA) 4.92 years.
- Wychavon (excluding WWA) 4.8 years.
- Worcester City 5.07 years.

~~36.41. When the plan is adopted, the static analysis will be able to count the allocations where completions are expected in the five-year period.~~

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Flexibility

~~37.42. The scale of potential housing supply currently forecast in Table 4e is over 200- nearly 300 dwellings more than the policy provision. This currently indicates a modest level of flexibility, but does not include additional large windfalls. As expressed, SWDP 3 does not preclude additional windfalls, small or large, from contributing to housing supply, subject to the SWDP's policies.~~

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Contingency Planning

~~38.43. House building rates were higher in the period 1996 - 2006. More recently, however, rates of housing delivery in the SWDP area have been lower, particularly in 2008 - 2011, reflecting the on-going impacts of economic recession and the housing market downturn. Completions improved in 2011-2012. Completions improved in 2011 - 2014, including 866 dwellings completed in 2013-14 in Wychavon which was more than three times the average annual completions in the preceding seven years. It is prudent to ensure the partner authorities are in a position to respond quickly to changing circumstances. Positive planning measures may be required to help bring forward sites for development earlier in the plan period to ensure a five-year supply of sites can be sustained.~~

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Risk Assessment of Obstacles and Constraints for Housing Delivery

~~39.44. The SHLAA already provides an assessment of the risk associated with potential constraints to site delivery. Identified risks (for example policy constraints, infrastructure requirements, ownership constraints and / or marketing constraints) are reflected in the potential phasing of development in relation to site delivery. In accordance with good practice guidance, sites are evaluated in terms of suitability, availability and achievability. Sites that are severely constrained and do not offer reasonable development potential do not form part of the overall housing land supply. The SHLAA is a dynamic process and will, through regular monitoring, be reviewed at least annually to ensure the most up-to-date and relevant site information is included for each identified site and this is~~

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carried through into an updated housing trajectory. The adoption of the SWDP will enable its site allocations to be included in the SHLAA analysis of the five5-year housing land supply.

Engaging with House Builders and stakeholders

40.45. House builders, developers and other key stakeholders were involved in the development of the SWDP at all preparation stages. Developers, landowners and their agents are actively encouraged to enter into early dialogue with the council partner authorities through pre-application discussions on potential housing schemes.

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Approach to Regular Monitoring and Review

41.46. The SWDP includes policy on the monitoring of development and a commitment to a review by-in 2019. Housing delivery will be monitored annually through a framework of monitoring indicators and an annual review and the roll-forward of the SHLAA. Evidence of a significant departure from the anticipated trajectory or policy would be reported through monitoring and could trigger an earlier review. The partner authorities will consider what actions to take should the AMR be unable to demonstrate that a sub-area has a continuous five5-year supply (plus 20% buffer) of developable and deliverable housing land in existing commitments and allocations. Governance relating to implementation is considered in relation to SWDP 62.

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Circumstances in which Specific Management Actions may be taken

42.47. ~~Policy on the phasing of housing is set out in Table 4c. This takes a longer term view of housing delivery, with a positive approach to completions.~~ The ~~2012~~2014 - based Housing Trajectories, set out in Annex E, ~~are more cautious,~~ reflecting contemporary information from developers and the building industry about delivery. Whilst the housing trajectories indicate that completions will start to recover substantially after the local plan is adopted, it is considered appropriate to identify a number of specific management actions to help bring sites forward for development in line with, or sooner than, the arc currently indicated in the trajectory, ~~to~~ This will enable a move towards meeting the phasing policy ambitions.

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43.48. A number of actions can potentially encourage sites to be brought forward. For example, these could include active engagement in:

- a. Working with house builders / landowners, to identify the main causes of supply problems and where appropriate to act on feedback received.
- b. Production of detailed Planning Briefs and / or area-based Supplementary Planning Documents, to increase certainty for developers on the progression of sites through the planning process.
- c. Regular meetings with stakeholders about the major urban extensions.
- d. As part of the preparation of Planning Briefs, indicate different development permutations to accommodate different viability scenarios.
- e. Pre-application discussions with developers, landowners and their agents to increase certainty in the development management process.
- f. Sensitive application of policy where issues around scheme viability have been clearly demonstrated.
- g. Prioritise public sector land.
- h. Seek public sector intervention and potential funding streams through the Homes and Communities Agency.

Employment

Establishing recreating the Conditions for Creating Jobs

44.49. Whilst forecasts of economic growth are not as optimistic as those made prior to the recession, the SWDP has made reasonable and appropriate allowance for economic recovery, including housing market recovery. This enables the area to be ready to take advantage of improvements in the economy when they do occur. The economic vision and strategy set out in the SWDP provides the context for making provision for employment land development. The distribution of growth is guided by the spatial strategy.

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45.50. The scale of provision in SWDP 3 (Table 4a) is consistent with [NPPF Framework](#) policy and principles on sustainable development, including the need for the SWDP to drive and support sustainable economic development. The provision requirements are targets, designed to enable the partner authorities to take a positive approach to sustainable new development. The scale of provision enables the SWDP to improve choice and provide essential flexibility, making it ready to respond to improved economic circumstances, consistent with the strategy being economic prosperity-led in order to create the right conditions to generate jobs.

46.51. The intention to review the SWDP by-in 2019 will enable the partner authorities to respond further to changing circumstances as needed.

Comment [LH1]: To be updated following consideration of SWDP62

47.52. A comprehensive portfolio of employment land is vital in securing economic prosperity. New employment provision (land and commercial premises) will be located primarily within or adjacent to the main urban areas. In order to meet these needs, additional job opportunities will be provided in the urban extensions, which will help to reduce commuting distances and ensure new workplaces are accessible by a range of travel modes.

48.53. Employment development at Worcester Technology Park's [sSouth](#) and [nNorth](#) phases will help to maximise the potential job generation provided by this site, which represents a significant sub-regional employment site within the area. Site-specific information is set out under SWDP45/5.

49.54. The evidence in the Economic Prosperity and Housing Background Papers demonstrates the approach adopted to ensuring the alignment of employment land and housing growth in a plan that proposes an economic prosperity-led planning strategy. ~~Sites have come forward recently and been permitted; the allocated site at Grove Farm, Worcester received permission in 2012, thus providing an important employment opportunity in the west of the city linked to the University of Worcester.~~

50.55. The Employment Land Review ([Roger Tym, 2011](#)) promoted an approach based on protecting the existing committed supply of readily available sites and encouraging the early provision of the employment land elements of the urban extensions. ~~There is a risk that if~~ [In the event of](#) the larger urban extension sites ~~are not~~ [being](#) made available until later in the plan period, there may be a shortfall of employment land in the middle of the plan period. However, the approach to employment land allocations in the [NPPF Framework](#) allows allocations to be reconsidered if there is evidence that they are unlikely to be delivered. The [NPPF Framework](#) focuses on the need for flexibility in employment land policies. Annual monitoring will report on the achievement of site delivery and other economic indicators.

Retail

51.56. Retailing is part of the wider economy of south Worcestershire and is a contributor to local economic prosperity. Retail sales and related consumer expenditure in the local area are influenced by population and income, the growth in households, consumer confidence, the local retail offer, competition from other destinations and the ability of local centres to retain their market share. SWDP 3 supports the economic strategy's focus on:

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- Sustaining and regenerating south Worcestershire's city and town centres as priority areas for regeneration.

- Retaining retail spending in south Worcestershire and increasing leisure and tourism spending / income.

52-57. The scale and distribution of retail floorspace provision in SWDP 3 is consistent with the evidence, notably the DPDS Retail Study Updates (December 2010 and September 2013). This took account of updated retail commitments, sales density, population and expenditure evidence as well as evidence about special forms of trading, so that the forecast growth of retail expenditure per head allows for internet sales. The consequence of the reduction in forecast expenditure growth is that only Worcester (about 9,80019,045 square metres comparison goods) and Malvern (3,600-3,662 square metres comparison goods) would have any significant need for additional retail floorspace before 203026. The evidence does not support the need to make additional provision for convenience floorspace.

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53-58. Centres that are able to maintain their market share and thus retain retail spending in south Worcestershire would be a significant achievement. Attracting investment that brings about development will be challenging, particularly during turbulent economic conditions. With less growth in comparison goods to cushion the loss of trade to out-of-centre locations, town centres are likely to be less resilient to such loss. The policies on retail development, including site allocations, support the spatial strategy including the sub-regional role of Worcester and the roles and functions of the other centres identified in SWDP 9. Concentrating the sale of comparison goods in the centres has advantages. This will include bulky goods, if the centres can accommodate them. These advantages include:

- a. Greater convenience for shoppers able to buy a range of goods on one multipurpose trip as well as undertaking related activities.
- b. Support for specialist shops and tourist facilities through joint trips.
- c. A service for residents, workers and those on low incomes without access to a car.
- d. An opportunity to enhance local community facilities.

54-59. If retail development is located in town centres and Worcester city centre, any retail development that exceeds the policy figures, but which is consistent with the role of the centres and benefits the vitality and viability of the centre, would not undermine the spatial strategy. Town centre schemes need to be of sufficient size to achieve viability. Qualitative improvement in the retail offer and environment of centres also helps to make them attractive to residents and visitors and will help them retain their market share.

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55-60. The 2010-retail evidence concluded that it is more likely that there will be pressure for retail investment in Worcester than elsewhere in the SWDP area as the economy recovers. SWDP 44 proposes site allocations in Worcester city centre that could accommodate substantially in excess of the floorspace requirement indicated by the retail study. Such growth would be consistent with the city centre's sub-regional role and would also be located in a highly sustainable location for retail development, one accessible by means of sustainable transport. The strength of the city centre lies in its ability to support a wide range of retail uses, from High Street names to small independent shops and markets that help to enhance its character and vibrancy. Being located at the hub of the public transport system, the city centre also provides a sustainable location for other activities such as work, culture, tourism, leisure and relaxation. SWDP 44 provides sufficient flexibility to enable the city centre to be in a position to benefit from economic recovery, respond to landowner / developer ambitions and accommodate unforeseen opportunities in line with NPPF Framework requirements.

56-61. By supporting the city centre and other town centres, planning policy can help to counter the previous trend towards dispersal, car dependence and inequality of access. However, there will be

pressures for out-of-centre development; SWDP 10 sets out policy on retail development outside main centres.

57-62. SWDP 3 identifies additional retail floorspace supply that relates to meeting local need in the Worcester South Urban Extension (SWDP45/1). As well as reducing the need to travel to other destinations in Worcester, this should reduce the generation of additional traffic flows across key junctions on the A4440 north of the urban extension at St Peters' in Worcester.